

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

MDL NO. 3076
CASE NO. 1:23-MD-03076-KMM

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

THIS DOCUMENT RELATES TO:

PROMOTERS AND DIGITAL CREATORS

**PLAINTIFFS' BRIEF OPPOSITION TO FTX DEFENDANTS' MOTION TO EXTEND
RESPONSE DEADLINE FOR SIX MONTHS [ECF NO. 923]**

Plaintiffs respectfully request the Court deny the “Promoter and Digital Creators”¹ request to extend briefing on their Motion to Dismiss for six months, through November 9, 2025. The Parties already agreed these FTX Defendants would have an extended forty-five (45) days to respond to the Amended Complaint, setting July 14, 2025 as their deadline. *See ECF No. 916, Ex. C*. The Amended Complaint has only the two claims the Court upheld (Florida and Oklahoma securities) and the amended California securities claim.² As explained in Plaintiffs’ Motion to Lift the Discovery Stay, [ECF No. 916], Plaintiffs request that this MDL Track should finally proceed, given the Court has already confirmed that the Amended Complaint states causes of action.

WHEREFORE, Plaintiffs respectfully request the Court deny the Promoter and Digital Creator Track Defendants’ motion for an extended briefing schedule and enter the previously agreed-upon schedule proposed in Plaintiffs’ Motion. *See ECF No. 916, Exhibit C*.

¹ While Plaintiffs and the Court have called this MDL Track of Defendants: “Promoters and Digital Creators,” these Defendants call themselves “Sports and Entertainment Defendants.”

² Most of these same firms already coordinated one Consolidated Motion to Dismiss.

Dated: June 3, 2025

By: /s/ Adam Moskowitz

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the forgoing was filed on June 3, 2025, via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam Moskowitz

Adam Moskowitz